

**Presentment Date and Time: November 16, 2021 at 4:00pm (ET)**  
**Objection Deadline: November 15, 2021 at 4:00pm (ET)**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

LATAM Airlines Group S.A., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No.: 20-11254 (JLG)

Jointly Administered

**NOTICE OF FILING OF STIPULATION AND ORDER  
BY AND BETWEEN THE DEBTORS AND ARAUCARIA LEASING LIMITED**

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: LATAM Airlines Group S.A. (59-2605885); Lan Cargo S.A. (98-0058786); Transporte Aéreo S.A. (96-9512807); Inversiones Lan S.A. (96-5758100); Technical Training LATAM S.A. (96-847880K); LATAM Travel Chile II S.A. (76-2628945); Lan Pax Group S.A. (96-9696800); Fast Air Almacenes de Carga S.A. (96-6315202); Línea Aérea Carguera de Colombia S.A. (26-4065780); Aerovías de Integración Regional S.A. (98-0640393); LATAM Finance Ltd. (N/A); LATAM-Airlines Ecuador S.A. (98-0383677); Professional Airline Cargo Services, LLC (35-2639894); Cargo Handling Airport Services LLC (30-1133972); Maintenance Service Experts LLC (30-1130248); Lan Cargo Repair Station LLC (83-0460010); Prime Airport Services, Inc. (59-1934486); Professional Airline Maintenance Services LLC (37-1910216); Connecta Corporation (20-5157324); Peuco Finance Ltd. (N/A); LATAM Airlines Perú S.A. (52-2195500); Inversiones Aéreas S.A. (N/A); Holdco Colombia II SpA (76-9310053); Holdco Colombia I SpA (76-9336885); Holdco Ecuador S.A. (76-3884082); Lan Cargo Inversiones S.A. (96-9696908); Lan Cargo Overseas Ltd. (85-7752959); Mas Investment Ltd. (85-7753009); Professional Airlines Services Inc. (65-0623014); Piquero Leasing Limited (N/A); TAM S.A. (N/A); TAM Linhas Aéreas S.A. (65-0773334); ABSA Aerolinhas Brasileiras S.A. (98-0177579); Prismah Fidelidade Ltda. (N/A); Fidelidade Viagens e Turismo S.A. (27-2563952); TP Franchising Ltda. (N/A); Holdco I S.A. (76-1530348) and Multiplus Corretora de Seguros Ltda. (N/A). For the purpose of these Chapter 11 Cases, the service address for the Debtors is: 6500 NW 22nd Street Miami, FL 33131.

**PLEASE TAKE NOTICE** that on May 26, 2020 (the “Initial Petition Date”), LATAM Airlines Group S.A. (“LATAM Parent”) and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”),<sup>2</sup> each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE** that on July 7 and 9, 2020 (as applicable to each Subsequent Debtor, the “Subsequent Petition Date” and together with the Initial Petition Date, as applicable to each Debtor, the “Petition Date”), additional LATAM affiliates TAM S.A., TAM Linhas Aéreas S.A., Aerolinhas Brasileiras S.A., Prismah Fidelidade Ltda., Fidelidade Viagens e Turismo S.A., TP Franchising Ltda., Holdco I S.A., Multiplus Corretora de Seguros Ltda. and Piquero Leasing Limited (the “Subsequent Debtors”) filed voluntary petitions under chapter 11 of the Bankruptcy Code (the “Subsequent Chapter 11 Cases” and together with the Initial Chapter 11 Cases, the “Chapter 11 Cases”).

**PLEASE TAKE FURTHER NOTICE** that on November 8, 2021, the Debtors filed the *Stipulation and Order by and Between the Debtors and Araucaria Leasing Limited* (the “Stipulation and Order”), attached hereto as Exhibit A. The Stipulation and Order will be presented for signature to the Honorable Judge James L. Garrity, Jr., United States Bankruptcy Judge for the Southern District of New York, Room 723, One Bowling Green, New York, NY 10004 on **November 16, 2021 at 4:00 p.m.** (the “Presentment Date”).

**PLEASE TAKE FURTHER NOTICE** that any objections or responses to the Stipulation and Order shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York, and the Order Implementing Certain Notice and Case Management Procedures [Docket No. 112] (the “Case Management Order”); (c) be filed electronically with this Court on the docket of In re LATAM Airlines Group S.A., Case 20-11254 (JLG) by registered users of this Court’s electronic filing system and in accordance with the General Order M-399 (which is available on this Court’s website at <http://www.nysb.uscourts.gov>); and (d) be served so as to be actually received by **November 15, 2021 at 4:00 p.m.**, prevailing Eastern Time (the “Objection Deadline”), by: (i) the Chambers of the Honorable Judge James L. Garrity, Jr., United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004; (ii) the Debtors, LATAM, Attn: Jose Miguel Valenzuela Roubillard, 6500 NW 22nd Street Miami, FL 33131, and counsel to the Debtors, Cleary Gottlieb Steen Hamilton LLP, One Liberty Plaza, New York, New York 10006, Attn: Richard J. Cooper, Esq., Lisa M. Schweitzer, Esq. and Luke A. Barefoot, Esq.; (iii) the Office of the United States Trustee for Region 2, Attn: Brian Masumoto, Esq., U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014; (iv) counsel for the official committee of unsecured creditors, Dechert LLP, 1095 6th Avenue, New York, NY 10036, Attn: Craig Druehl, Esq., Allan Brilliant, Esq., and David Herman, Esq.; (v) counsel for Araucaria Leasing Limited, Winston & Strawn LLP, 200 Park Avenue, New York, New York

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<sup>2</sup> LATAM Parent, and its Debtor and non-Debtor subsidiaries and affiliates are collectively referred to as “LATAM”.

10166, Attn: David Neier, Esq. and (vi) any parties that have appeared and requested notice pursuant to the Bankruptcy Rules.

**PLEASE TAKE FURTHER NOTICE** that if an objection is timely filed by the Objection Deadline, the Court will notify the Debtors and the objecting parties of the date and time of the hearing with respect to the applicable Stipulation(s) and the Debtors' obligation to notify all other parties entitled to receive notice. The Debtors and any objecting parties are required to attend the hearing in accordance with General Order M-543 (which can be found at <http://www.nysb.uscourts.gov>), and failure to attend may result in relief being granted or denied upon default.

**PLEASE TAKE FURTHER NOTICE** that copies of the Stipulation and Order and other pleadings for subsequent hearings may be obtained free of charge by visiting the Prime Clerk website at <https://cases.primeclerk.com/LATAM>. You may also obtain copies of any pleadings by visiting at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: November 8, 2021  
New York, New York

/s/ Lisa M. Schweitzer

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